

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
Red River Talc LLC, ¹	:	Case No. 24-90505 (CML)
	:	
Debtor.	:	
	:	
	X	

**MOTION OF THE OFFICIAL COMMITTEE
OF TALC CLAIMANTS AND ITS PROFESSIONALS FOR LIMITED
RECONSIDERATION OR CLARIFICATION OF MEMORANDUM
DECISION AND ORDER
[Dkt. No. 1424]**

The Official Committee of Talc Claimants (the “**Committee**”), the Committee members in their individual capacities, and the Committee professionals² on their own behalf and as parties in interest (collectively, “**Movants**”), respectively move, pursuant to Bankruptcy Rules 9023 and 9024 and 11 U.S.C. § 105, for reconsideration, amendment of, or relief from the Court’s Memorandum Decision and Order [Dkt. No. 1424] (the “**Order**”), on the following grounds and to the following limited extent.

On March 31, 2025, the Court entered its Order addressing the confirmation of the Debtors’ plan and denying confirmation of the plan. In addition, at the end of the Order, the Court found it appropriate to dismiss this case, and the Court ordered the case dismissed.

¹ The last four digits of the debtor’s federal tax identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, NJ 08933.

² The Committee’s professionals include Stutzman, Bromberg, Esserman, & Plifka, P.C., Paul Hastings LLP, Brown Rudnick LLP, and FTI Consulting Inc. Paul Hastings, Brown Rudnick, and FTI have retention applications pending and will also file fee applications, as will Stutzman Bromberg.

The deadline to move for reconsideration of and/or to appeal the Order is April 14. With the case ordered to be dismissed, it was unclear to the Movants if the case would be administratively closed on or shortly after April 14 or would remain open at least for the purpose of allowing the parties to pursue, and the Court to consider, determine, and resolve, various administrative matters still pending, including, without limitation, the following pending and anticipated motions or applications:

- 1) applications by the Committee or its members for Committee member expenses;
- 2) retention applications and fee applications of Committee professionals, including Brown Rudnick, Paul Hastings, and FTI Consulting, and fee applications by Stutzman, Bromberg;
- 3) Any other pending or anticipated administrative motions or applications appropriate to be heard and ruled on, including, but not limited to, the retention or fee applications of Debtors or FCR professionals.

If permitted, the Movants will pursue their pending and anticipated applications as expeditiously as the Rules, the Court, and the parties will allow.

This Motion is made in the main case only, not in the adversary proceeding, and is not intended to, and does not seek to, revive the injunction in the adversary proceeding or create or revive a stay of litigation on any of the claimants.

Accordingly, the Movants respectfully request that the Court amend or clarify the Order as necessary for the Court to retain jurisdiction and provide that the case remain administratively open for purposes of briefing, hearing, and ruling on the various pending and anticipated administrative and compensation applications and motions of Movants and other professionals and experts.

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, PC

/s/ Sander L. Esserman

Sander L. Esserman

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**COUNSEL FOR THE COMMITTEE OF TALC
CLAIMANTS**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served via the Court's ECF system to all parties authorized to receive electronic notice in this case, and by email upon the Master Service List (Dkt. No. 1392) on April 14, 2025.

/s/ Peter D'Apice

Peter D'Apice